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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ERIN HALL, an individual,

Plaintiff,

vs.

MARCH MANAGEMENT, LLC, a Utah
Limited Liability Company; CLINICAL
EXAM EXPERTS, LLC, a Utah Limited
Liability Company; JORDON
KENNETH MARCH, M.D., an
individual; DOES I through X; and ROE
Corporations XI through XX, inclusive,

Defendant(s).

Case No.2:24-cv-00668-JAD-NJK

**STIPULATED DISCOVERY
PLAN AND SCHEDULING
ORDER**

**SUBMITTED IN COMPLIANCE
WITH LR 26-1(b)**

STIPULATED DISCOVERY PLAN AND SCHEDULING ORDER

Plaintiff Erin Hall ("Plaintiff") and Defendants March Management, LLC, Clinical Exam Experts, LLC, and Jordon Kenneth March, M.D. (collectively "Defendants" and together with Plaintiff, the "Parties") by and through their respective counsel, submit this Stipulated Discovery Plan and Scheduling Order as required under Federal Rule of Civil Procedure 26(f) and Local Rule 26-1.

Fed. R. Civ. P. 26(f) Conference

On April 18, 2024, the Parties telephonically met and conferred regarding the below certifications and discovery plan. The discovery plan complies with LR 26-1(b).

Fed. R. Civ. P. 26(f) Report

1. What changes should be made in the timing, form, or requirement for disclosures under Fed. R. Civ. P. 26(a), including a statement of when initial disclosures were made or will be made?

Initial disclosures will be made on or before May 2, 2024, which is 14 days after the Fed. R. Civ. P. 26 (f) conference.

2. The subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused on particular issues?

The scope of discovery shall be as set forth under Fed. R. Civ. P. 26(b)(1). The Parties do not believe that discovery should be conducted in phases or limited to any particular issues at this time.

Certifications

1. Alternative Dispute Resolution. The Parties discussed the possibility of using alternative dispute-resolution processes including mediation and arbitration. The Parties discussed the upcoming ENE, [ECF No. 9], currently scheduled for June 12, 2024, and will engage in good faith to attempt to settle this matter at the ENE.

2. Alternative Forms of Case Disposition. The Parties discussed consent to trial by a Magistrate Judge under 28 U.S.C. § 636 and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01). At this time, the Parties cannot reach agreement upon alternative forms of case disposition.

3. Electronic Evidence. The Parties discussed whether they intend to present evidence in electronic format to jurors for the purposes of jury deliberations. The

1 Parties believe that any electronic evidence to be provided or presented would be
2 compatible with the Court's electronic jury evidence display system and have not entered
3 into any stipulations regarding electronic evidence at this time.

4 Discovery Plan

5 **1. Discovery Cut-Off Date.** On April 12, 2024, Defendants filed their Answer
6 to the Complaint [ECF No. 7]. The discovery cut-off will be 180 days from that date,
7 **October 9, 2024.**

8 **2. Initial Disclosures.** The Parties agree that the deadline for initial
9 disclosures is **May 2, 2024.**

10 **3. Amending Pleadings and Adding Parties.** The deadline for filing
11 motions to amend the pleadings or to add parties is 90 days before the close of
12 discovery. These amendments are therefore due on **July 11, 2024.**

13 **4. Fed. R. Civ. P 26(a)(2) Disclosures (Experts).** Expert disclosures must
14 be made 60 days before the discovery cut-off date and rebuttal-expert disclosures must
15 be made 30 days after the initial disclosure of experts. Expert disclosures are due on
16 **August 12, 2024**, and rebuttal-expert disclosures are due on **September 11, 2024.**

17 **5. Dispositive Motions.** The deadline for filing dispositive motions is 30
18 days after the discovery cut-off date. Dispositive motions are due on **November 8,**
19 **2024.**

20 **6. Pretrial Order.** The deadline for the joint pretrial order is 30 days after the
21 dispositive motion deadline, **December 9, 2024.** If dispositive motions are filed, the
22 deadline for filing the joint pretrial order will be suspended until 30 days after decision on
23 the dispositive motions or further court order.

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1 **7. Fed. R. Civ. P. 26(a)(3) Disclosures.** Disclosures required under Fed. R.
2 Civ. P. 26(a)(3) and any objections to them must be included in the Joint Pretrial Order.

3 Dated: May 2, 2024

Dated: May 2, 2024

4 SNELL & WILMER L.L.P.

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By: /s/ Christian Gabroy

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10 *Attorneys for Defendants March*
11 *Management, LLC, Clinical Exam*
12 *Experts, LLC,*
13 *and Jordon Kenneth March, M.D.*

Attorneys for Plaintiff Erin Hall

14 IT IS SO ORDERED:

15 
16 UNITED STATES MAGISTRATE JUDGE

17 DATED: May 3, 2024